

UNITED STATES
DISTRICT OF MINNESOTA
Criminal No. 22-cr-223 (MJD/DTS)

UNITED STATES OF AMERICA,

Plaintiff,

v.

Ahmed Abdullahi Ghedi,

Defendant.

**DEFENDANT AHMED ABDULLAHI
GHEDI'S MOTION TO DISCLOSE
AND MAKE INFORMANT
AVAILABLE FOR INTERVIEW AND
TO DISCLOSE PROMISES OF
FAVORABLE TREATMENT**

The above-named Defendant, Ahmed Abdullahi Ghedi, by and through his attorney, Glenn P. Bruder, Mitchell, Bruder and Johnson, and pursuant to Fed. R. Crim. P. 16, *Roviaro v United States*, 353 US 53 (1957), *Brady v Maryland*, 373 US 83 (1963), requests the court to order the government to disclose the following information:

1. The names of any and all reporting persons, informants, or witnesses providing information to law enforcement regarding this case.
2. Any and all promises of payment, written or oral, made to such person as part of this or any other case in which they have provided information.
3. All promises of any other benefit, written or oral, made to such persons.
4. All promises of immunity, leniency, preferential treatment or other inducements made to such person as part of this case or any other case in which they may have provided information.
5. All writings or memoranda which contain any of the promises of remuneration, leniency, immunity, preferential treatment, or other inducements.
6. Any record of payment of funds made to such persons.

7. All information regarding any such informant's prior testimony in this or any other proceeding in which they have acted as a witness and/or informant. See *Johnson v Brewer*, 521 F.2d 556 (8th Cir. 1975).

8. All evidence of the informant's psychiatric treatment, if any, or of any addiction or propensity to use or abuse controlled substances.

9. In addition to the foregoing, Defendant also requests that the government be required to produce the informant for an interview by Defendant's counsel.

Dated: December 21, 2023

Respectfully submitted,

MITCHELL, BRUDER & JOHNSON

/s/ *Glenn P. Bruder*

Attorney for Defendant

9531 West 78th Street

Suite 210

Eden Prairie, MN 55344

(952) 831-3174